

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GARY KOOPMANN, TIMOTHY KIDD and
VICTOR PIRNIK, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff(s),

v.

FIAT CHRYSLER AUTOMOBILES N.V.,
FCA US LLC, SERGIO MARCHIONNE,
RICHARD K. PALMER, SCOTT
KUNSELMAN, MICHAEL DAHL, STEVE
MAZURE and ROBERT E. LEE

Defendants.

Civ. Action No: 15-cv-07199-JMF

CLASS ACTION

DECLARATION OF JEREMY A. LIEBERMAN

I, Jeremy A. Lieberman, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner of the law firm of Pomerantz LLP, appointed by the Court as Co-Lead Counsel in this action. I am personally involved in the representation of Plaintiffs and the putative class and submit this declaration in support of Plaintiffs' Reply Letter to their Letter Motion Seeking Order Granting Leave to take 40 Depositions. I have personal knowledge of the matters set forth herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of a document produced by Defendants in this Action bearing bates numbers FCA-PIRNIK-001735195-196.

3. Attached hereto as Exhibit 2 is a true and correct copy of email communications between Michael J. Wernke and Josh S. Levy, cc'ing Veronica V. Montenegro and Sara Fuks, dated April 24, 2018 through May 1, 2018.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of May 2018, in New York, NY.

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman